

#04-7984
P.C. 8400120

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To: "wvogl@samhsa.gov" <wvogl@samhsa.gov>
Date: 7/12/04 10:08AM
Subject: docket #04-7984

Good morning, I am including my comments to the proposed revisions & congratulations for such an excellent work.

In regard to oral fluid specimens, I have two recommendations:

1. Use of an FDA-accepted collection device specifically designed for drugs of abuse should be required.

2. According to the new guidelines proposed, oral fluid testing is suited only for reasonable suspicion/cause & post accident. In order to use oral fluid testing as the primary specimen for workplace drug testing, oral fluid testing should be allowed for random testing (without prior notice), for return to duty & followup. A short detection window does not rule out the use of oral fluid as a sample choice for the drug-free workplace.

3. Taking in consideration the short detection window in oral fluid, a sample collected for workplace drug testing should not need collecting a urine sample at the same time that the oral fluid to protect from incorrect results from marijuana environmental exposure, especially if the person is at the workplace. At present, there is no legal reason that would justify to be in company of people smoking marijuana & if there was so, the employee should submit evidence that justifies the use.

Thanks,
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